

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

R.M.S. TITANIC, INC.,
successor in interest to Titanic
Ventures, limited partnership,

Plaintiff,

v.

Civil Action No. 2:93cv902

The Wrecked and Abandoned
Vessel, . . .believed to be
the RMS TITANIC, in rem,

Defendant.

**PLAINTIFF R.M.S. TITANIC, INC.'S
MOTION TO FILE CERTAIN DILIGENCE EXHIBITS UNDER SEAL**

Plaintiff RMS Titanic, Inc. ("RMST"), by counsel, pursuant to Rule 5 of the Local Civil Rules of the United States District Court for the Eastern District of Virginia, hereby moves to file certain of the exhibits submitted to the Court on November 2, 2018, ("the Due Diligence Exhibits") under seal. Specifically, RMST moves to file Due Diligence Exhibits: Exhibit G, the three (3) leases for RMST's permanent exhibition sites and artifact storage warehouse in Atlanta, Georgia, Orlando Florida, and Las Vegas, Nevada and certain exhibition agreements; and Exhibit I, the Loan Agreement with National Museums Northern Ireland, under seal. For the reasons set forth in the accompanying Memorandum in Support, RMST respectfully requests that the Court grant this Motion to Seal and enter the Proposed Order attached hereto as Exhibit 1, sealing Exhibits G and I.

Respectfully submitted,

R.M.S. TITANIC, INC.

By Counsel

/s/

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CERTIFICATION

I hereby certify that the foregoing has been electronically filed through the Court's ECF system this 2nd day of November, 2018.

/s/
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